

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GREGORY THOMAS BERRY *et al.*,

Plaintiffs,

v.

Civil Action No. 3:11cv754

**LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC.,
SEISINT, INC.,
and
REED ELSEVIER INC.,**

Defendants.

**DEFENDANTS' MEMORANDUM IN SUPPORT OF THEIR
MOTION TO EXCEED PAGE LIMITATIONS**

Defendants, LexisNexis Risk & Information Analytics Group, Inc., Seisint, Inc. and Reed Elsevier Inc. (collectively "Defendants"), by counsel, for its Memorandum in Support of Their Motion to Exceed the Page Limit ("Motion") states as follows.

1. Although counsel for Defendants has made reasonable efforts to keep their memorandum within the limitations of Local Rule 7(F)(3), counsel were unable to address the extensive facts and arguments at issue without slightly exceeding the page limitations.

2. No party will suffer prejudice.

3. Good cause exists for the granting of this Motion.

WHEREFORE, Defendants respectfully request that the Court: (1) grant their Motion to Exceed Page Limitations; (2) permit the filing of a memorandum in support no longer than 38 pages; and (3) award Defendants such further relief as the Court deems appropriate.

**LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC.,
SEISINT, INC.,
and
REED ELSEVIER INC.**

By: /s/ David N. Anthony

David N. Anthony
Virginia State Bar No. 31696
Counsel for Defendants
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-5410
Facsimile: (804) 698-5118
Email: david.anthony@troutmansanders.com

Ronald Irvin Raether, Jr.
Counsel for Defendants
FARUKI IRELAND & COX PLL
500 Courthouse Plaza SW
10 N Ludlow St.
Dayton, OH 45402
Telephone: 937-227-3733
Facsimile: 937-227-3717
Email: rraether@ficlaw.com

James Francis McCabe
Counsel for Defendants
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105-2482
Telephone: 415-268-7011
Facsimile: 415-268-7522
Email: jmccabe@mofo.com

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will then send a notification of such filing (NEF) to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service or by electronic mail the document to the non- CM/ECF participants.

Leonard A. Bennett
Susan M. Rotkis
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Boulevard, Suite 1A
Newport News, Virginia 23601
Telephone: 757-930-3660
Facsimile: 757-930-3662
Email: lenbennett@clalegal.com
Emails: srotkis@clalegal.com
Counsel for Plaintiffs

Michael A. Caddell
Cynthia B. Chapman
Craig C. Marchinado
Caddell & Chapman
1331 Lamar St., Suite 1070
Houston, TX 77010
Telephone: 713-751-0400
Facsimile: 713-751-0906
Email: mac@caddellchapman.com
Email: cbc@caddellchapman.com
Email: ccm@caddellchapman.com
Counsel for Plaintiffs

James Arthur Francis
David A. Searles
Erin A. Novak
John Soumilas
Francis & Mailman PC
Land Title Building
100 S Broad Street 19th Floor
Philadelphia, PA 19110
Telephone: 215-735-8600
Facsimile: 215-940-8000
Email: jfrancis@consumerlawfirm.com
Email: dsearles@consumerlawfirm.com
Email: enovak@consumerlawfirm.com
Email: jsoumilas@consumerlawfirm.com
Counsel for Plaintiffs

Dale Wood Pittman
The Law Office of Dale W. Pittman, P.C.
The Eliza Spotswood House
112-A W Tabb St.
Petersburg, VA 23803-3212
Telephone: 804-861-6000
Facsimile: 804-861-3368
Email: dale@pittmanlawoffice.com
Counsel for Plaintiffs

Janelle Mason Mikac
Consumer Litigation Associates PC (Alex)
1800 Diagonal Rd., Suite 600
Alexandria, VA 22314
Telephone: 703-273-7770
Facsimile: 888-892-3512
Email: janelle@clalegal.com
Counsel for Plaintiffs
Jeanne Giles
260 Gooseberry Drive
Reno, NV 89523
Pro Se

Adam E. Schulman
Center for Class Action Fairness
1718 M. Street NW #236
Washington, DC 20036
Pro Se

David Brown
1717 Market Street
Tacoma, WA 98402
Pro Se

William Paul Ferranti (*Pro Hac Vice*)
Winston & Strawn LLP (IL-NA)
35 W. Wacker Dr.
Chicago, IL 60601-9703

Attorneys for Megan Christina Aaron, et al.

Charles Bennett Molster, III
Winston & Strawn LLP
1700 K St. NW
Washington, DC 20006

Kimball Richard Anderson (*Pro Hac Vice*)
Winston & Strawn LLP (IL-NA)
35 W. Wacker Dr.
Chicago, IL 60601-9703

Samuel Issacharoff (*Pro Hac Vice*)
40 Washington Square South
411J
New York, NY 10012

/s/ David N. Anthony

David N. Anthony
Virginia State Bar No. 31696
Counsel for Defendants
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-5410
Facsimile: (804) 698-5118
Email: david.anthony@troutmansanders.com